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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 IN RE: COLLEGE ATHLETE NIL  
12 LITIGATION

Case No. 4:20-cv-03919-CW

**DECLARATION OF CLASS  
MEMBER CHARLES O'BANNON,  
JR., IN SUPPORT OF OBJECTION  
TO CERTAIN TERMS OF THE  
PARTIES' PROPOSED  
SETTLEMENT**

Hon. Claudia Wilken

19       1. I am a 6-foot, 6-inch Division 1 basketball player. I played basketball  
20 for University of Southern California (USC) from 2017-2019 and for Texas Christian  
21 University (TCU) from 2020-2024.

22        2. I am a member of the settlement class of D1 athletes in the above-  
23 captioned case, which class is represented by Winston & Strawn and Hagens Berman  
24 Sobol Shapiro LLP.

25       3. I am concerned that all D1 athletes, especially Black athletes, have the  
26 opportunity to learn about the pending settlement so that these athletes can submit a  
27 claim form, opt-out, or as I have asked my counsel to do, submit an objection  
28 requesting modification of the settlement.

4. I have submitted a claim form to preserve my rights under the proposed  
settlement. However, through my counsel, Bradford Edwards LLP, I wish to object  
to certain terms of the proposed settlement.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true. Executed this 29<sup>th</sup> day of January, 2025 at

Signed by:

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CHARLES O'BANNON, JR.